



Phelps Dodge Copper Products Company, PO Box 20000, El Paso, Texas 79998
Phelps Dodge Refining Corporation, PO Box 20001, El Paso, Texas 79998 (915) 775-8807 FAX (915) 775-8327

PE - TXD 144

HAND DELIVERED

August 3, 1998

Mr. Dois D. Webb, P.E.
Mechanical Section, New Source Review Permits Division
Texas Natural Resource Conservation Commission
P.O. Box 13087
Austin, Texas 78711-3087

Re: Permit Application/ Permit Amendment Permit No. 8647
Phelps Dodge El Paso Refinery/El Paso, El Paso County/Account ID No. EE-0067-L

Dear Mr. Webb:

Enclosed is a "Form PI-1, General Application-Air Quality Permit" dated August 3, 1998 to update our existing permit application identified as an amendment to Permit No. 8647. This application was originally submitted last fall to permit existing operations at Phelps Dodge El Paso Refinery.

Additional information for the updated application will be submitted around November 1, 1998. This additional information will include information regarding replacement or upgrading of a wet scrubber in the Copper Sulfate Plant, revisions to the Table 1(a) emission rates for the chlorine scrubber and the anode shaft furnaces and associated baghouses, and addition of standby power generators to the application. Changes in baghouse operation and stack configuration at the anode furnaces will be provided.

Revised modeling will be conducted based on the changes in the permit application described above. Also, revised modeling will be conducted based on the additional furnace to be constructed at the Phelps Dodge El Paso Rod Mill and the option chosen to address carbon monoxide and copper emissions at the El Paso Rod Mill. A separate PI-1 form is being submitted today to update an existing permit application for the El Paso Rod Mill identified as Permit No. 36726/890. Completed modeling will be included with the submission of additional information around November 1.

The submittal of additional information around November 1 will address your June 3, 1998 request for additional information regarding this same permit application.

We look forward to completing this review. If you have any questions or comments regarding the proposed schedule for submission, please contact Ms. Ann Allen in our Refinery Environmental Department at 915-775-8822.

Sincerely,


Ernesto Arriola
Manager, Phelps Dodge Refining Corporation

Enclosure

Cc: Mr. Archie Clouse, Air Program Manager, TNRCC Region 6, El Paso
Mr. Jesus Reynoso, Program Supervisor, El Paso City-County Health & Environmental District, El Paso
EPA Region 6, New Source Review Program, Dallas

VI. SUBMIT THE FOLLOWING GENERAL INFORMATION:

- A. Submit a current area map as specified in the Instructions.
Are any schools located within 3000 feet of this facility? [] YES [X] NO.
- B. Submit a plot plan of the plant property as specified in the Instructions.
- C. Submit emission data, including fugitive emissions and stack parameters, on Table 1(a).
Attach emission calculations and information showing how emissions were determined.
See Instructions for further details.
- D. Submit an analysis of Source Reduction Alternatives and Best Available Control Technology, including the estimated installed capital and operating costs for all source reduction and abatement equipment associated with the facility. See Instructions for further details.

☆☆☆☆☆☆☆☆☆☆☆☆☆☆☆☆☆☆☆☆ VERY IMPORTANT! ☆☆☆☆☆☆☆☆☆☆☆☆☆☆☆☆☆☆☆

- E. Franchise Tax. Is your company in good standing with the State Comptroller's Office? See Instructions if you are not a corporation or for further information. [x] YES [] NO.
- F. Permit Fee. Enclose required fee, fee certification and estimated capital cost (Table 30); or furnish explanation why fee is not required. (See §116.141.)

- G. Please submit actual emissions (tons per year) for the last two (2) years to determine federal applicability.
- H. Are there any exemptions or grandfathered units related to this permit that you wish to roll into the permit or amendment at this time? [x] Yes [] No
Provide information on these units.

VII. SUBMIT (A) PROCESS FLOW DIAGRAM, (B) PROCESS DESCRIPTION AND (C) MATERIAL BALANCE AS SPECIFIED IN THE INSTRUCTIONS (see Instructions concerning submittal of confidential information.)

VIII. GENERAL APPLICATION REQUIREMENTS: Submit itemized information and/or analysis that will demonstrate that all general application requirements as specified in 30 TAC Chapter 116, §116.111 are met. Each requirement in §116.111 must be addressed in this application. See Instructions for further details. Atmospheric dispersion modeling may be required as part of the air quality impact analysis per §116.111(9).

Is this facility a MAJOR SOURCE/MODIFICATION/RECONSTRUCTION with regard to one of the following:

1. §116.111(7) - Nonattainment [] YES [X] NO
 2. §116.111(8) - Prevention of Significant Deterioration [] YES [X] NO.
 3. FCAA §112(b) - Hazardous Air Pollutants (HAPs) [] YES [X] NO.
- Does a MACT standard in 40 CFR Chapter 63 apply to this facility? [] YES [X] NO.
- Is this facility located at a major source as defined in 30 TAC Chapter 122? [X] YES [] NO.

IX. APPEAL PROCESS:

Commission §116.114(a)(3) should be consulted for the procedure to be used to appeal the failure of the agency to process an application within the prescribed time limits.

- X. A COPY OF THIS APPLICATION AND ALL ATTACHMENTS MUST BE SENT by the applicant to the EPA Region 6 office in Dallas if PSD or Nonattainment Review is applicable in any form, the appropriate TNRCC Regional Office and to any local air pollution control program having jurisdiction. Copies of the application were sent to:
EPA Region 6 Office in Dallas [X] YES [] Not applicable.
TNRCC Regional Office sent to: (city) TNRCC Region 6- El Paso
Copies sent to these local programs: 1. El Paso City-County Health and Environmental District
[] NOT APPLICABLE. 2. _____

XI. §116.110(d). PE Seal.

Is the estimated capital cost of the project for which application is made greater than \$2 million dollars? [X] YES [] NO
if YES, application must be submitted under seal of a Texas registered Professional Engineer, unless exemption is claimed pursuant to the Texas Engineering Practice Act.
[] - Exemption is claimed pursuant to Section _____ of the TEPA.

- XII. The International Boundary Water Commission (IBWC) wishes to be notified of any new construction within 100 kilometers of the Rio Grande River. For the mailing address of the IBWC, please refer to the PI-1 instructions.

XIII. I, Ernesto Arriola Manager Phelps Dodge Refining Corporation

(Name - Please print or type)

(Title: Owner, Plant Manager, President, Vice-President, Environmental Director, etc.)

I state that I have knowledge of the facts herein set forth and that the same are true and correct to the best of my knowledge and belief. I further state that to the best of my knowledge and belief, the project for which application is made will not in any way violate any provision of the Texas Health & Safety Code (THSC), Chapter 382, Texas Clean Air Act, as amended, or any of the air quality Rules and Regulations of the Texas Natural Resource Conservation Commission or any local governmental ordinance or resolution enacted pursuant to the Texas Clean Air Act. I further state that I have read and understand Section 382.091, THSC, which defines CRIMINAL OFFENSES for certain violations, including intentionally or knowingly making or causing to be made false material statements or representations in this application, and Section 382.092, THSC, pertaining to CRIMINAL PENALTIES.

DATE 8/3/98 SIGNATURE Ernesto Arriola**NOTE - ORIGINAL SIGNATURE IN INK IS REQUIRED.**



Phelps Dodge Copper Products Company, PO Box 20000, El Paso, Texas 79998
Phelps Dodge Refining Corporation, PO Box 20001, El Paso, Texas 79998 (915) 775-8807 FAX (915) 775-8327

HAND DELIVERED

August 3, 1998

Mr. Dois D. Webb, P.E.
Mechanical Section, New Source Review Permits Division
Texas Natural Resource Conservation Commission
P.O. Box 13087
Austin, Texas 78711-3087

RECEIVED
AUG 12 1998
Air/Toxics & Inspection
Coordination Branch
GEN-A

Re: Permit Application/ Permit No. 36726/P890
Phelps Dodge El Paso Rod Mill/El Paso, El Paso County/Account ID No. EE-0066-N

Dear Mr. Webb:

Enclosed is a "Form PI-1, General Application-Air Quality Permit" dated August 3, 1998 to update our existing permit application identified as Permit No. 36726/P890. This application was originally submitted to permit an existing shaft furnace at Phelps Dodge El Paso Rod Mill.

The updated application enclosed will permit a second shaft furnace at the El Paso Rod Mill in addition to the existing shaft furnace. The two furnaces will be operated alternately.

Additional information for the updated application will be submitted around November 1, 1998. This additional information will include information regarding the second shaft furnace to be constructed and the proposed option for addressing carbon monoxide and copper emissions from the existing furnace and the second shaft furnace.

Revised modeling will be conducted based on the additional furnace and the option chosen to address carbon monoxide and copper emissions. Completed modeling will be included with the submission of additional information around November 1.

The submittal of additional information around November 1 will address your June 3, 1998 request for additional information regarding this same permit application.

We look forward to completing this review. If you have any questions or comments regarding the proposed schedule for submission, please contact Ms. Ann Allen in our Refinery Environmental Department at 915-775-8822.

Sincerely,

Jon W. Griffith
Manager, Phelps Dodge Copper Products Company

Enclosure

Cc: Mr. Archie Clouse, Air Program Manager, TNRCC Region 6, El Paso
Mr. Jesus Reynoso, Program Supervisor, El Paso City-County Health & Environmental District, El Paso
EPA Region 6, New Source Review Program, Dallas



TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
FORM PI-1, GENERAL APPLICATION -- AIR QUALITY PERMIT -- (Page 1 of 2)

A PERMIT TO CONSTRUCT MUST BE APPROVED BEFORE ANY ACTUAL WORK IS BEGUN ON THE FACILITY. This is not a stand alone document. Please refer to the "Form PI-1, Permit Application Instructions" manual (Instructions) for specific details to complete this application. Please print or type all information. All information requested herein must be completed and submitted before public notification procedures may be authorized. Please contact the CORE Section of the New Source Review Division with any questions at 512 239-1240 (FAX No. 512 239-1300). Written inquiries may be addressed to: Texas Natural Resource Conservation Commission, Office of Air Quality, New Source Review Division (MC-162), P.O. Box 13087, Austin TX 78711-3087.

☆☆☆☆☆☆☆☆☆☆☆☆☆☆☆☆☆☆☆☆ VERY IMPORTANT! ☆☆☆☆☆☆☆☆☆☆☆☆☆☆☆☆☆☆☆

- Is **CONFIDENTIAL** information being submitted with this application? [] YES [x] NO
If YES, is each "confidential" page so marked in big red letters? [] YES [] NO
- Has a **CORE** checklist been attached to this application? [x] YES [] NO
- Is this application in response to or related in any way to a
Notice of Violation at this location? [] YES [x] NO.
If YES, date of Notice of Violation: _____
Also, if YES, pursuant to Rule: _____

Please furnish the following information pertaining to this facility **SITE**:

1. Please estimate the net number of new jobs which will be created in the community as a result of the operation of the facility authorized by this application: 0
2. Name of elected State Senator: Eliot Shapleigh
3. Name of elected State Representative: Norma Chavez

Please furnish the following information pertaining to **Compliance History**:

Submit a 5-year Compliance History in accordance with 30 Texas Administrative Code (TAC) Chapter 166, Sections 116.120-116.126 for all facilities classified in Sections V.C and V.D of Form PI-1 below.

I. TYPE OF APPLICATION: [x] CONSTRUCTION PERMIT [] AMENDMENT, Permit No. _____
[] FLEXIBLE PERMIT [] FLEXIBLE PERMIT AMENDMENT

A. PERMIT ISSUED TO: _____

(Entity legally responsible for permit; i.e., Owner or Operator of the facility)

Permittee's Texas State Comptroller's Tax ID No.: 1-13-2575365-2

Permittee's address (Person, Title, Address): Jon W. Griffith, Manager Phelps Dodge Copper Products Company,
P.O. Box 20200, El Paso, Texas 79998

phone: (915) 775 - 8855 FAX: () -

Permittee's Technical Contact (Person, Title, Address): David L. Fisher, Environmental Coordinator, Phelps Dodge
Copper Products Company, P.O. Box 20200, El Paso, Texas 79998

phone: (915) 775 - 8349 FAX: (915) 775 - 8354

B. OWNER OF FACILITY: Phelps Dodge Corporation

(If different from permittee, include names of proprietor/general partner(s) if applicable)

Owner's Texas State Comptroller's Tax ID No.: N/A

Owner's address (Person, Title, Address): Phelps Dodge Corporation, 2600 N. Central Ave., Phoenix, Arizona 85004-3014

C. PRINCIPAL COMPANY PRODUCT OR BUSINESS: copper rod and wire

Plant SIC Code: 3351

II. FACILITY PHYSICAL LOCATION:

A. Name of plant or site: El Paso Rod Mill

B. Street Address: 897 Hawkins

C. Nearest City: El Paso

County: El Paso

Site Zip Code: 79915

D. Latitude: 31° 46' 00" N Longitude: 106° 23' 30" W (must be to nearest second)

E. Plant Site TNRCC Air Quality Account Number: EE - 0066 - N

III. FACILITY TYPE AND OPERATING SCHEDULE:

A. Name of facility to be permitted: El Paso Rod Mill Shaft Furnaces

B. Facility Type (Check One): [X] Permanent, [] Portable.

C. Facility Operating Schedule: (24) Hours/day; (7) Days/week; (52) Weeks/year

() Seasonal - explain: _____

D. Start Dates (Proposed/Actual): Construction: 1 / 1 / 81 (P/A) A Operation: 11 / 18 / 82 (P/A) A
Construction: 6 / 1 / 99 (P/A) P Operation: 12 / 1 / 00 (P/A) P

IV. FACILITY CLASSIFICATION (Check only one block):

A. [x] New Permitted Facility - New grass roots Facility at this location.

B. [] New Permitted Facility - Modification of existing non-permitted Facility.

C. [] Amendment to Permitted Facility. Permit No(s) _____

D. [] Change in Location of Permitted Facility. Permit No(s) _____

Location of Present Facility: _____

V. COMPLIANCE HISTORY (See attached Supplemental Information Sheet):

A. [] Exemption claimed under §116.121, or

B. [x] Existing Site = > 5 years old. TNRCC will compile Compliance History, or

C. [] New Site (This is a new grass roots site with no operating history); does applicant have similar facilities in Texas?

[] YES [] NO*, or

D. [] Existing Site < 5 years old; does applicant have similar facilities in Texas? [] YES [] NO*.

Note: If either "C" or "D" is NO, attach one of the following:

a. [] Compliance History for similar sites in other States. If none, then:

b. [] Compliance History as required by 30 TAC Chapter 116, §116.122(b)

(Over)

VI. SUBMIT THE FOLLOWING GENERAL INFORMATION:

- A. Submit a current area map as specified in the Instructions.
Are any schools located within 3000 feet of this facility? ☐ YES ☒ NO.
- B. Submit a plot plan of the plant property as specified in the Instructions.
- C. Submit emission data, including fugitive emissions and stack parameters, on Table 1(a).
Attach emission calculations and information showing how emissions were determined.
See Instructions for further details.
- D. Submit an analysis of Source Reduction Alternatives and Best Available Control Technology, including the estimated installed capital and operating costs for all source reduction and abatement equipment associated with the facility. See Instructions for further details.

***** VERY IMPORTANT ! *****

- E. Franchise Tax. Is your company in good standing with the State Comptroller's Office? See Instructions if you are not a corporation or for further information. ☒ YES ☐ NO.
- F. Permit Fee. Enclose required fee, fee certification and estimated capital cost (Table 30); or furnish explanation why fee is not required. (See §116.141.)

- G. Please submit actual emissions (tons per year) for the last two (2) years to determine federal applicability.
- H. Are there any exemptions or grandfathered units related to this permit that you wish to roll into the permit or amendment at this time? ☐ Yes ☒ No
Provide information on these units.

VII. SUBMIT (A) PROCESS FLOW DIAGRAM, (B) PROCESS DESCRIPTION AND (C) MATERIAL BALANCE AS SPECIFIED IN THE INSTRUCTIONS (see Instructions concerning submittal of confidential information.)

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Is this facility a MAJOR SOURCE/MODIFICATION/RECONSTRUCTION with regard to one of the following:

1. §116.111(7) - Nonattainment ☐ YES ☒ NO
 2. §116.111(8) - Prevention of Significant Deterioration ☒ YES ☐ NO.
 3. FCAA §112(b) - Hazardous Air Pollutants (HAPs) ☐ YES ☒ NO.
- Does a MACT standard in 40 CFR Chapter 63 apply to this facility? ☐ YES ☒ NO.
- Is this facility located at a major source as defined in 30 TAC Chapter 122? ☒ YES ☐ NO.

IX. APPEAL PROCESS:

Commission §116.114(a)(3) should be consulted for the procedure to be used to appeal the failure of the agency to process an application within the prescribed time limits.

- X. A COPY OF THIS APPLICATION AND ALL ATTACHMENTS MUST BE SENT by the applicant to the EPA Region 6 office in Dallas if PSD or Nonattainment Review is applicable in any form, the appropriate TNRCC Regional Office and to any local air pollution control program having jurisdiction. Copies of the application were sent to:
EPA Region 6 Office in Dallas ☒ YES ☐ Not applicable.
TNRCC Regional Office sent to: (city) TNRCC Region 6- El Paso
Copies sent to these local programs: 1. El Paso City-County Health and Environmental District
☐ NOT APPLICABLE. 2. _____

XI. §116.110(d). PE Seal.

Is the estimated capital cost of the project for which application is made greater than \$2 million dollars? ☒ YES ☐ NO
if YES, application must be submitted under seal of a Texas registered Professional Engineer, unless exemption is claimed pursuant to the Texas Engineering Practice Act.

☐ - Exemption is claimed pursuant to Section _____ of the TEPA.

- XII. The International Boundary Water Commission (IBWC) wishes to be notified of any new construction within 100 kilometers of the Rio Grande River. For the mailing address of the IBWC, please refer to the PI-1 instructions.

XIII. I, Jon W. Griffith

Manager Phelps Dodge Copper Products Company

(Name - Please print or type)

(Title: Owner, Plant Manager, President, Vice-President, Environmental Director, etc.)

I state that I have knowledge of the facts herein set forth and that the same are true and correct to the best of my knowledge and belief. I further state that to the best of my knowledge and belief, the project for which application is made will not in any way violate any provision of the Texas Health & Safety Code (THSC), Chapter 382, Texas Clean Air Act, as amended, or any of the air quality Rules and Regulations of the Texas Natural Resource Conservation Commission or any local governmental ordinance or resolution enacted pursuant to the Texas Clean Air Act. I further state that I have read and understand Section 382.091, THSC, which defines CRIMINAL OFFENSES for certain violations, including intentionally or knowingly making or causing to be made false material statements or representations in this application, and Section 382.092, THSC, pertaining to CRIMINAL PENALTIES.

DATE 8-3-95 SIGNATURE Jon W. Griffith

NOTE - ORIGINAL SIGNATURE IN INK IS REQUIRED.



RECEIVED
US EPA, DALLAS, TX
ASSOCIATE DIRECTOR

TV144 W12
11 0000 466273
A1/A1/co

15 DEC 21 PM 2:41
Phelps Dodge Refining Corporation
897 Hawkins Blvd., El Paso, TX 79915 • (915) 782-7301 • FAX (915) 782-7789

COMPLIANCE ASSURANCE
& ENFORCEMENT DIV.

CERTIFIED MAIL - ARTICLE NUMBER 7011 3500 0002 2424 4281
RETURN RECEIPT REQUESTED

December 15, 2015

US EPA, Region 6
Air Enforcement 6EN-A
1445 Ross Ave, Ste. 1200
Dallas, Texas 75202

Re: Phelps Dodge Refining Corporation, El Paso Refinery and Rod Mill
Account No. EE-0067-L
Title V Operating Permit No. O-1602
RN: RN100226000
CN: CN600132187
Semi-Annual Deviation Report – May 18, 2015, through November 17, 2015

To whom it may concern:

As required by the referenced Federal Operating Permit, Phelps Dodge El Paso Operations is enclosing the Semi-Annual Deviation Report for the respective period stated above, as well as a signed OP-CR01 form.

If you should have any questions or concerns, please do not hesitate to call me at (915) 782-7353.

Sincerely,

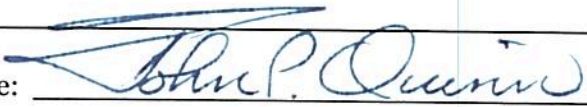
Rajesh Bhakta
Sr. Environmental Engineer

Enclosures: Semi-Annual Deviation Report – May 2015, through November 2015
Form OP-CR01



Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. IDENTIFYING INFORMATION					
RN: 100226000		CN: 600132179		Account No.: EE-0067-L	
Permit No.: O1602			Project No.: 1602		
Area Name: Phelps Dodge El Paso Operations			Company Name: Phelps Dodge Corporation		
II. CERTIFICATION TYPE <i>(Please mark the appropriate box)</i>					
<input checked="" type="checkbox"/> Responsible Official			<input type="checkbox"/> Duly Authorized Representative		
III. SUBMITTAL TYPE <i>(Please mark the appropriate box) (Only one response can be accepted per form)</i>					
<input type="checkbox"/> SOP/TOP Initial Permit Application		<input type="checkbox"/> Update to Permit Application			
<input type="checkbox"/> GOP Initial Permit Application		<input type="checkbox"/> Permit Revision, Renewal, or Reopening			
<input checked="" type="checkbox"/> Other: <u>Semi Annual Deviation Report</u>					
IV. CERTIFICATION OF TRUTH					
This certification does not extend to information which is designated by the TCEQ as information for reference only.					
I, <u>John P. Quinn</u> certify that I am the <u>RO</u> <i>(Certifier Name printed or typed)</i> <i>(RO or DAR)</i>					
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete:					
<i>Note: Enter EITHER a Time Period OR Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i>					
Time Period: From _____ to _____ <div style="text-align: center;"><i>Start Date</i> <i>End Date</i></div>					
Specific Dates: <u>5/18/15- 11/17/15 (Semi Annual Deviation Report)</u>					
<i>Date 1</i>		<i>Date 2</i>		<i>Date 3</i>	<i>Date 4</i>
			<i>Date 5</i>	<i>Date 6</i>	
Signature: <u></u> Signature Date: <u>12/15/15</u>					
Title: <u>General Manager</u>					



Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

AIR CO/RN100226000/RP

Permit Holder Name		Phelps Dodge Corporation				Customer Number		CN600132179	
Area Name		Phelps Dodge El Paso Operations				Account Number		EE-0067-L	
Report Period Start Date	05/18/2015	Report Period End Date	11/17/2015	Operating Permit Number	O1602	Report Submittal Date	12/15/2015		
Operating Permit Requirement for Which Deviations are Being Reported									
ID Number		Term & Condition No.		Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID								
Shaft Furnace Fabric Filter Baghouse (Furnace No. 2)	RM EP01A	FOP Special Condition 9		PM	NSR Permit #36726, Special Condition 9 as defined by Special Condition 14	Permit Standard	N/A	NSR Permit #36726, Special Condition 14	Permit requires daily monitoring but Permittee monitors continuously

Dev Item No.	STEERS Incident No.	Deviation Period				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
1	N/A	7/08/2015	21:50	7/08/2015	21:58	1	At approximately 21:50, the differential pressure had spiked slightly above 7 inches for a few seconds during the 8 minute manual cleaning cycle. Upon further investigation, it was determined that the draft set point was fixed at 0.3. Having the draft set at 0.3, in conjunction with not having the cleaning cycle on Automatic caused the blower to work at a maximum of 60	Installed automatic controls to set furnace to low fire if the permit parameters approach limits. Also, installed alarm to ensure that the automatic cleaning cycle is engaged when operating.

							Hz (100%), thus causing the differential pressure to rise until the cleaning cycle was manually initiated. During this 8 minutes, no emission limits were exceeded because the damper closes during a cleaning cycle, thus not allowing emissions to enter the RTO.	
Total Deviations:							1	Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO



**Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 3)
OPTIONAL**

Miscellaneous Monitoring and Credible Evidence Submittal

Deviation Item Number	Monitoring Method/ Evidence Reference	Monitoring/Evidence Results supporting Compliance Status	Additional Materials attached? Y/N
1	Furnace/RTO operational parameters	Pressure gauges are installed, calibrated and maintained to monitor and record the differential pressure. The differential pressure is recorded on a daily basis to maintain compliance.	N



AI/CO

11000046273

TX 144 V, 2

Phelps Dodge Refining Corporation
897 Hawkins Blvd., El Paso, TX 79915 • (915) 782-7301 • FAX (915) 782-7789

CERTIFIED MAIL - ARTICLE NUMBER 7011 3500 0002 2424 4182
RETURN RECEIPT REQUESTED

June 12, 2015

US EPA, Region 6
Air Enforcement 6EN-A
1445 Ross Ave, Ste. 1200
Dallas, Texas 75202

RECEIVE

JUN 15 2015

Air Toxics & Inspection
Coordination Branch
6EN-A

Re: Phelps Dodge Refining Corporation, El Paso Refinery and Rod Mill
Account No. EE-0067-L
Title V Operating Permit No. O-1602
RN: RN100226000
CN: CN600132187
Annual Compliance Certification – May 18, 2014, through May 17, 2015

To whom it may concern:

As required by the referenced Federal Operating Permit, Phelps Dodge El Paso Operations is enclosing the Annual Compliance Certification (PCC) for the respective period stated above, as well as a signed OP-CR01 form.

If you should have any questions or concerns, please do not hesitate to call me at (915) 782-7353.

Sincerely,

Rajesh Bhakta
Sr. Environmental Engineer

Enclosures: Annual Compliance Certification (PCC) – May 2014, through May 2015
Form OP-CR01



**Texas Commission on Environmental Quality
Federal Operating Permit Form
Permit Compliance Certification – PCC (Part 1)**

Permit Holder Name	Phelps Dodge Refining Corporation	Customer Number	CN600132179
Area Name	El Paso Refinery and Rod Mill	Account Number	EE-0067-L
Operating Permit Number	O - 1602	Report Submittal Date	6/12/2015
Certification Period Start Date	5/18/2014	End Date	5/17/2015

I. Certification of Continuous Compliance with Permit Terms and Conditions (Indicate response by placing a 'x' in the appropriate column for each of the following questions)	Response:	
	Yes	No
With the possible exception of those permit terms and conditions identified in the 'Summary of Deviations' found using, at a minimum, but not limited to, the continuous or intermittent compliance method data from monitoring, recordkeeping, reporting, or testing required by the permit and any other credible evidence or information, was the permit holder in continuous compliance with all the terms and conditions of the permit over the Certification Period?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

II. Summary of Deviations (Indicate response by placing a 'x' in the appropriate column for each of the following questions)	Response:	
	Yes	No
<p>A. Were there any deviations from any permit requirements during the Certification Period that have <i>previously</i> been reported to the agency?</p> <p>If the answer to this question is 'Yes', please complete and attach Part 2 to this submittal.</p> <p><i>Important Note:</i> If previously submitted reports did not contain specific information on monitoring methods, frequency and the total number of deviations experienced over the entire certification period, then use form DevRep to provide that information.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>B. Were there any deviations from any terms or conditions of the permit during the Certification Period that are <i>currently</i> being submitted to the agency?</p> <p>If the answer to this question is 'Yes', please include the relevant reports along with this page.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



Texas Commission on Environmental Quality
Form OP-CRO1 - Instructions
Certification by Responsible Official

General:

Title 30 Texas Administrative Code § 122.132(e) [30 TAC § 122.132(e)] (relating to “Application and Required Information for Initial Permit Issuance, Reopening, Renewal, or General Operating Permits”) and 30 TAC § 122.165 (relating to “Certification by a Responsible Official”) require that a Responsible Official (RO), or appropriate designee, shall certify all documents submitted to the Texas Commission on Environmental Quality (TCEQ) in support of a federal operating permit (FOP), or that are required by 30 TAC Chapter 122 or by an operating permit condition(s). This Form OP-CRO1 (Certification by Responsible Official) satisfies these certification requirements in a manner consistent with 30 TAC § 122.165.

(Certification by the authorized Designated Representative (DR), or Alternate Designated Representative (ADR), apply to the Acid Rain or CAIR, Program sources only and is executed on OP-CRO1, page 2 [Certification by Designated Representative]. The DR or ADR shall certify application information for sites with one or more units subject to the Acid Rain or CAIR Programs and shall certify application information and reports as an RO. This OP-CRO1, page 2 [Certification by Designated Representative] satisfies these certification requirements in a manner consistent with 30 TAC § 122.165.)

All initial, revision, and renewal FOP applications, as well as all post-issuance submittals requiring certification must be accompanied by Form OP-CRO1. However, while a site operating permit (SOP) or temporary operating permit (TOP) is undergoing technical review, application updates (e.g., administrative changes, responses to a TCEQ permit application deficiency notice, or request for information) do not require a Form OP-CRO1 to be included with each submittal. This certification will be requested at the time of the Working Draft Permit review, and any required certifications must be included with the applicant’s response to the review of the Working Draft Permit. (Refer to the Working Draft Permit Review Fact Sheet at www.tceq.texas.gov/permitting/air/titlev/site/sop_wdp_factsheet.html for additional details.)

Likewise, updates to general operating permit (GOP) applications undergoing technical review do not require a Form OP-CRO1 to be included with each submittal and need only be certified prior to being granted an authorization to operate under the GOP by the TCEQ. All SOP application updates submitted after public notice authorization or start of public announcement, or GOP application updates submitted after being granted authorization to operate, must be accompanied by a completed Form OP-CRO1.

All materials related to public notice certification must also be certified; including the original tearsheet(s), publisher’s affidavit(s), and the “Public Notice Verification Form/Air Permits.” Dates of these submittals should be included on the certification form submitted immediately following the close of the public comment period. (Specific details regarding these submittals and the certification procedure are included in the Public Notice Authorization Package sent to applicants with draft FOPs)

The dates of each application update submittal being certified may be entered on a Form OP-CRO1. (Up to eight submittal dates may be entered on each form.) Alternatively, a single Form OP-CRO1 may be used to certify a range of dates (time period). Note that the time period option may not be used if “Submittal Type” in Section III is “Other.”

If the RO authority is being delegated to a DAR, a completed and signed Form OP-DEL entitled "Delegation of Responsible Official" must also be submitted in order for the DAR certification to be valid. Form OP-DEL need not be included in subsequent submittals unless there is a new appointment or an administrative information change regarding the DAR.

This form must bear the signature of the RO, DAR, DR, or ADR and a signature date in order for the certification to be valid. **The Signature Date, which will be used to validate signature authority of the RO, DAR, DR, or ADR, must be on or after the effective date of the RO, DAR, DR, or ADR certifying to the change.** Signature stamps can be accepted in place of an original signature. Faxes and photocopies can be accepted in place of an original certification form; however, a follow-up submittal of the original signed certification form is requested. **This certification does not extend to information which is designated by the TCEQ as "information for reference only."** Please refer to the TCEQ guidance entitled "Applying for an Initial Title V permit" or "Responsible Official Certifications" for additional information.

IMPORTANT: At any time after the initial permit application submittal when a new RO, DR, or ADR is appointed, or there is a change to the administrative information regarding the RO, DR, or ADR (e.g., address, phone number, title), the applicant must submit a completed Form OP-CRO2 "Change of Responsible Official Information," to the TCEQ Air Permits Division for notification purposes. At any time after the initial permit application submittal that a new DAR is appointed, or there is a change to the administrative information regarding the DAR, the applicant must submit a completed Form OP-DEL to the TCEQ Air Permits Division for notification purposes.

Specific:

I. IDENTIFYING INFORMATION

- o **RN:** Enter the regulated entity reference number (RNXXXXXXXXXX) for the site. This number is assigned by the TCEQ as part of the central registry process. If a regulated entity reference number has not yet been assigned, leave this space blank. Do not enter permit numbers, project numbers, account numbers, etc. in this space.
- o **CN:** Enter the Customer Reference Number (CNXXXXXXXXXX). This number is assigned by the TCEQ as part of the central registry process. If a customer reference number has not yet been assigned, leave this space blank. Do not enter permit numbers, project numbers, account numbers, etc. in this space.
- o **Account No:** Enter the primary TCEQ account number (XX-XXXX-X) for the site if assigned. (Some newer facilities will not have this number, in which case the space should be left blank.)
- o **Permit No.:** Enter the operating permit number, if assigned (OXXXXX). If this is the first submittal regarding an initial application for an SOP, a TOP, or a GOP, the permit number will be assigned upon receipt by the TCEQ. In this case, enter "TBA" for "to be assigned." The permit number will appear on all correspondence from the TCEQ regarding the application.
- o **Project No.:** Enter the project number that identifies this specific permitting action, if assigned (XXXX). If this is the first submittal regarding an initial, revision, or renewal application submittal (SOP, TOP, or GOP), the project number will be assigned upon receipt by the TCEQ. In this case, enter "TBA" for "to be assigned." The project number will appear on all correspondence from the TCEQ regarding the application.

- o **Area Name:** Enter the area name used in the “Application Area Information” section of the most recent Form OP-1 (Site Information Summary) submitted with the application (maximum 50 characters). If there is only one permit at the site, the area name is the same as the site name.
- o **Company Name:** Enter the name of the company for which the application is being submitted (maximum 50 characters). The company name on this form should be the same as the Customer Name listed in Section II of the TCEQ Core Data Form.

II. CERTIFICATION TYPE

Indicate the type of certification by marking the appropriate box or boxes.

- o **Responsible Official:** Select this option if certification is being made by the RO.
- o **Duly Authorized Representative:** Select this option if certification is being made by the DAR. The DAR must have been previously designated using Form OP-DEL (Delegation of Responsible Official), or a completed OP-DEL must accompany the Form OP-CRO1

III. SUBMITTAL TYPE

Indicate the type of attached submittal by entering an “X” in the box next to one of the following options:

- o **SOP/TOP Initial Permit Application:** Select the option if this certification accompanies the first submittal regarding an initial SOP or TOP application.
- o **GOP Initial Permit Application:** Select this option if this certification accompanies the first submittal regarding an initial GOP application.
- o **Permit Revision, Renewal, or Reopening:** Select this option if this certification accompanies the first submittal regarding a revision, reopening, or renewal application for an SOP, TOP, or GOP.
- o **Update to Permit Application:** Select this option if this certification addresses updates to any permit application (initial, revision, renewal) currently under review. Application updates include administrative changes, responses to deficiency notices or requests for information from the reviewer, working draft permit comments, public notice information, or other follow-up information submitted prior to issuance.
- o **Other:** Select this option if the submittal is not one of the types listed above. Identify the type of submittal in the space provided (maximum 25 characters). Examples include, but are not limited to:
 - Annual Compliance Certification
 - Progress Report
 - Deviation Report
 - Monitoring Report
 - Test Report

IV. CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS

Certifier Name: Print or type the name of the RO or DAR (maximum 25 characters).

Certifier Type: Enter the type of signature authority held by the certifier, “RO” or “DAR.”

Documentation Dates: Enter either a Time Period or Specific Date(s) as defined below. These dates will be used to link the Form OP-CRO1 to the documentation being certified. Do not enter signature dates. ***This section must be completed. The certification is not valid without documentation date(s).*** Note that all submittals containing application-related information (including by fax or e-mail) must be certified.

Time Period: Enter the start and end dates of the time period that contains all submitted application documentation (MM-DD-YYYY) that was not previously certified. This option may only be used when:

- The "Submittal Type" is 'Update to Permit Application' and there are multiple uncertified submittals; or
- A submittal package has multiple dates recorded in the documentation.

Note: The Time Period option may only be used when the "Submittal Type" is "Update to Permit Application" and there are multiple uncertified submittals; or a submittal package has multiple dates recorded in the documentation. Do not use the Time Period option if the "Submittal Type" is "Other."

Specific Dates: Enter a date or date(s) (MM-DD-YYYY) for each application submittal that was not previously certified. If a submittal package has multiple dates recorded in the documentation, each date may be listed, or the overall submittal date (e.g., cover letter date) may be listed. Please do not repeat documentation dates on multiple certifications. If more than eight (8) date spaces are needed, use multiple forms.

Signature: A signature of the RO or DAR is required. Signature stamps can be accepted in place of an original signature.

Signature Date: Enter the date this form was signed by the RO or DAR (MM-DD-YYYY). The certifier must have signature authority on this date in order for certification to be valid.

Title: Enter the job title of the RO or DAR.



Certification by Designated Representative
For Affected Sources that are subject to the following Programs:
Acid Rain, Clean Air Interstate Rule (CAIR)

Specific:

I. IDENTIFYING INFORMATION

Please use the same instructions for Section I Form OP-CRO1, Page 1.

II. CERTIFICATION TYPE

Indicate the type of certification by marking the appropriate box or boxes.

- ☐ **Designated Representative:** Select this option if this form is being used as certification by the DR.
- ☐ **Alternate Designated Representative:** Select this option if this form is being used as certification by the ADR.

III. PERMIT and SUBMITTAL TYPE

- ☐ Indicate the Permit type of attached by marking the box next to the applicable option(s):
 - Acid Rain
 - CAIR
- ☐ Indicate the Submittal type of attached by marking the box next to one of the following options:
 - Initial Permit Application
 - Update to Permit Application
 - Permit Revision or Renewal
 - Other

IV. CERTIFICATION

Certifier Name: Print or type the name of the DR or ADR (maximum 25 characters).

Certifier Type: Enter the type or types of signature authority held by the certifier as "DR," or "ADR."

Note: Enter EITHER a Time Period OR Specific Date(s) as defined below; these dates will be used to link the Form OP-CRO1, page 2 to the documentation being certified. The certification is not valid without documentation date(s). Do not enter signature dates.

Documentation Dates: Enter either a Time Period or Specific Date(s) as defined below. These dates will be used to link the Form OP-CRO1 to the documentation being certified. Do not enter signature dates. ***This section must be completed. The certification is not valid without documentation date(s).*** Note that all submittals containing application-related information (including by fax or e-mail) must be certified.

Time Period: Enter the start and end dates of the time period that contains all previous and currently submitted, and as yet uncertified, documentation (MM-DD-YYYY). Start and end dates are allowed only when certifying updates to the permit application or when a submittal package has multiple dates recorded in the documentation. The DR or ADR must have signature authority for the entire time period indicated.

Note: The Time Period option may only be used when the "Submittal Type" is "Update to Permit Application" and there are multiple uncertified submittals; or a submittal package has multiple dates recorded in the documentation. Do not use the Time Period option if the "Submittal Type" is "Other."

Specific Dates: Enter the date(s) recorded on all previous and currently submitted, and as yet uncertified, documentation (MM-DD-YYYY). Multiple dates are allowed only when certifying updates to the permit application or when a submittal package has multiple dates recorded in the documentation. The DR or ADR must have signature authority for all documentation dates indicated.

Signature: A signature of the DR or ADR is required. Signature stamps can be accepted in place of an original signature.

Signature Date: Enter the date this form was signed by the DR or ADR (MM-DD-YYYY). This date will be used to ensure signature authority and is required in order for certification to be valid.

Title: Enter the job title of the DR or ADR.



Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. IDENTIFYING INFORMATION		
RN: 100226000	CN: 600132187	Account No.: EE-0067-L
Permit No.: O1602	Project No.: 1602	
Area Name: El Paso Refinery and Rod Mill	Company Name: Phelps Dodge Refining Corporation	
II. CERTIFICATION TYPE <i>(Please mark the appropriate box)</i>		
<input checked="" type="checkbox"/> Responsible Official	<input type="checkbox"/> Duly Authorized Representative	
III. SUBMITTAL TYPE <i>(Please mark the appropriate box) (Only one response can be accepted per form)</i>		
<input type="checkbox"/> SOP/TOP Initial Permit Application	<input type="checkbox"/> Update to Permit Application	
<input type="checkbox"/> GOP Initial Permit Application	<input type="checkbox"/> Permit Revision, Renewal, or Reopening	
<input checked="" type="checkbox"/> Other: <u>Semi Annual Deviation Report and Annual Compliance Certification</u>		
IV. CERTIFICATION OF TRUTH		
<p>This certification does not extend to information which is designated by the TCEQ as information for reference only.</p> <p>I, <u>John P. Quinn</u> certify that I am the <u>RO</u> <i>(Certifier Name printed or typed)</i> <i>(RO or DAR)</i></p> <p>and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete:</p> <p><i>Note: Enter EITHER a Time Period OR Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i></p> <p>Time Period: From _____ to _____ <i>State Date</i><i>End Date</i></p> <p>Specific Dates: <u>11/18/14-5/17/15 (Semi Annual Deviation Report)</u> <u>5/18/14-5/17/15 (Annual Compliance Certification)</u></p> <p>Signature: <u></u> Signature Date: <u>6/12/15</u></p> <p>Title: General Manager _____</p>		



Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

AIR CO/RN100226000/RP

Permit Holder Name		Phelps Dodge Refining Corporation				Customer Number	CN600132179	
Area Name		Phelps Dodge El Paso Operations				Account Number	EE-0067-L	
Report Period Start Date	5/18/2014	Report Period End Date	5/17/2015	Operating Permit Number	O1602	Report Submittal Date	06/12/2015	
Operating Permit Requirement for Which Deviations are Being Reported								
ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							

Dev Item No.	STEERS Incident No.	Deviation Period			No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start Date	End Date	Time			
Total Deviations: 0						Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO



AI/AI/CO 11 0000 466273
T144V.2

RECEIVED

Phelps Dodge Refining Corporation
897 Hawkins Blvd., El Paso, TX 79915 • (915) 782-7301 • FAX (915) 782-7789

CERTIFIED MAIL - ARTICLE NUMBER 7011 3500 0002 2424 4090
RETURN RECEIPT REQUESTED

DEC 17 2014

Permit & Inspection
Division Branch
EN-A

December 15, 2014

US EPA, Region 6
Air Enforcement 6EN-A
1445 Ross Ave, Ste. 1200
Dallas, Texas 75202

Re: Phelps Dodge Refining Corporation, El Paso Refinery and Rod Mill
Account No. EE-0067-L
Title V Operating Permit No. O-1602
RN: RN100226000
CN: CN600132187
Semi-Annual Deviation Report – May 18, 2014, through November 17, 2014

To whom it may concern:

As required by the referenced Federal Operating Permit, Phelps Dodge El Paso Operations is enclosing the Semi-Annual Deviation Report for the respective period stated above, as well as a signed OP-CR01 form.

If you should have any questions or concerns, please do not hesitate to call me at (915) 782-7353.

Sincerely,

Rajesh Bhakta
Sr. Environmental Engineer

Enclosures: Semi-Annual Deviation Report – May 2014, through November 2014
Form OP-CR01



Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. IDENTIFYING INFORMATION					
RN: 100226000		CN: 600132179		Account No.: EE-0067-L	
Permit No.: O1602			Project No.: 1602		
Area Name: Phelps Dodge El Paso Operations			Company Name: Phelps Dodge Corporation		
II. CERTIFICATION TYPE <i>(Please mark the appropriate box)</i>					
<input checked="" type="checkbox"/> Responsible Official			<input type="checkbox"/> Duly Authorized Representative		
III. SUBMITTAL TYPE <i>(Please mark the appropriate box) (Only one response can be accepted per form)</i>					
<input type="checkbox"/> SOP/TOP Initial Permit Application		<input type="checkbox"/> Update to Permit Application			
<input type="checkbox"/> GOP Initial Permit Application		<input type="checkbox"/> Permit Revision, Renewal, or Reopening			
<input checked="" type="checkbox"/> Other: <u>Semi Annual Deviation Report</u>					
IV. CERTIFICATION OF TRUTH					
This certification does not extend to information which is designated by the TCEQ as information for reference only.					
I, <u>John P. Quinn</u> certify that I am the <u>RO</u> <i>(Certifier Name printed or typed)</i> <i>(RO or DAR)</i>					
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete:					
<i>Note: Enter EITHER a Time Period OR Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i>					
Time Period: From _____ to _____ <div style="text-align: center;"><i>Start Date</i> <i>End Date</i></div>					
Specific Dates: <u>5/18/14- 11/17/14 (Semi Annual Deviation Report)</u>					
<i>Date 1</i>		<i>Date 2</i>		<i>Date 3</i>	<i>Date 4</i>
<i>Date 5</i>			<i>Date 6</i>		
Signature: <u>John P. Quinn</u> Signature Date: <u>12/15/14</u>					
Title: <u>General Manager</u>					



Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

AIR CO/RN100226000/RP

Permit Holder Name	Phelps Dodge Refining Corporation					Customer Number	CN600132179
Area Name	Phelps Dodge El Paso Operations					Account Number	EE-0067-L
Report Period Start Date	5/18/2014	Report Period End Date	11/17/2014	Operating Permit Number	O1602	Report Submittal Date	12/15/2014
Operating Permit Requirement for Which Deviations are Being Reported							
ID Number	Term & Condition No.		Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method
Unit ID	Group ID						Monitoring Frequency

Dev Item No.	STEERS Incident No.	Deviation Period			No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start Date	Start Time	End Time			
Total Deviations: 0					Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		



AI/AI/CO 010000466273

454769 V.2

Phelps Dodge Refining Corporation
897 Hawkins Blvd., El Paso, TX 79915 • (915) 782-7301 • FAX (915) 782-7789

CERTIFIED MAIL - ARTICLE NUMBER 7011 3500 0002 2423 6132
RETURN RECEIPT REQUESTED

June 13, 2014

US EPA, Region 6
Air Enforcement 6EN-A
1445 Ross Ave, Ste. 1200
Dallas, Texas 75202

RECEIVE

JUN 16 2014

Air/Toxics & Inspection
Coordination Branch
6EN-A

Re: Phelps Dodge Refining Corporation, El Paso Refinery and Rod Mill
Account No. EE-0067-L
Title V Operating Permit No. O-1602
RN: RN100226000
CN: CN600132187
Annual Compliance Certification – May 18, 2013, through May 17, 2014

To whom it may concern:

As required by the referenced Federal Operating Permit, Phelps Dodge El Paso Operations is enclosing the Annual Compliance Certification (PCC) for the respective period stated above, as well as a signed OP-CR01 form.

If you should have any questions or concerns, please do not hesitate to call me at (915) 782-7353.

Sincerely,

Rajesh Bhakta
Sr. Environmental Engineer

Enclosures: Annual Compliance Certification (PCC) – May 2013, through May 2014
Form OP-CR01



Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. IDENTIFYING INFORMATION		
RN: 100226000	CN: 600132187	Account No.: EE-0067-L
Permit No.: O1602	Project No.: 1602	
Area Name: El Paso Refinery and Rod Mill	Company Name: Phelps Dodge Refining Corporation	
II. CERTIFICATION TYPE <i>(Please mark the appropriate box)</i>		
<input checked="" type="checkbox"/> Responsible Official	<input type="checkbox"/> Duly Authorized Representative	
III. SUBMITTAL TYPE <i>(Please mark the appropriate box) (Only one response can be accepted per form)</i>		
<input type="checkbox"/> SOP/TOP Initial Permit Application	<input type="checkbox"/> Update to Permit Application	
<input type="checkbox"/> GOP Initial Permit Application	<input type="checkbox"/> Permit Revision, Renewal, or Reopening	
<input checked="" type="checkbox"/> Other: <u>Semi Annual Deviation Report and Annual Compliance Certification</u>		
IV. CERTIFICATION OF TRUTH		
<p>This certification does not extend to information which is designated by the TCEQ as information for reference only.</p> <p>I, <u>John P. Quinn</u> certify that I am the <u>RO</u> <i>(Certifier Name printed or typed)</i> <i>(RO or DAR)</i></p> <p>and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete:</p> <p><i>Note: Enter EITHER a Time Period OR Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i></p> <p>Time Period: From _____ to _____ <i>State Date</i><i>End Date</i></p> <p>Specific Dates: <u>11/18/13-5/17/14 (Semi Annual Deviation Report)</u> <u>5/18/13-5/17/14 (Annual Compliance Certification)</u></p> <p>Signature: <u>John P. Quinn</u> Signature Date: <u>6/13/14</u></p> <p>Title: General Manager _____</p>		



**Texas Commission on Environmental Quality
Federal Operating Permit Form
Permit Compliance Certification – PCC (Part 1)**

Permit Holder Name	Phelps Dodge Refining Corporation	Customer Number	CN600132179
Area Name	El Paso Refinery and Rod Mill	Account Number	EE-0067-L
Operating Permit Number	O - 1602	Report Submittal Date	6/13/2014
Certification Period Start Date	5/18/2013	End Date	5/17/2014

I. Certification of Continuous Compliance with Permit Terms and Conditions (Indicate response by placing a 'x' in the appropriate column for each of the following questions)	Response:	
	Yes	No
With the possible exception of those permit terms and conditions identified in the 'Summary of Deviations' found using, at a minimum, but not limited to, the continuous or intermittent compliance method data from monitoring, recordkeeping, reporting, or testing required by the permit and any other credible evidence or information, was the permit holder in continuous compliance with all the terms and conditions of the permit over the Certification Period?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

II. Summary of Deviations (Indicate response by placing a 'x' in the appropriate column for each of the following questions)	Response:	
	Yes	No
<p>A. Were there any deviations from any permit requirements during the Certification Period that have <i>previously</i> been reported to the agency?</p> <p>If the answer to this question is 'Yes', please complete and attach Part 2 to this submittal.</p> <p><i>Important Note:</i> If previously submitted reports did not contain specific information on monitoring methods, frequency and the total number of deviations experienced over the entire certification period, then use form DevRep to provide that information.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>B. Were there any deviations from any terms or conditions of the permit during the Certification Period that are <i>currently</i> being submitted to the agency?</p> <p>If the answer to this question is 'Yes', please include the relevant reports along with this page.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

AIR CO/RN100226000/RP

Permit Holder Name		Phelps Dodge Refining Corporation				Customer Number	CN600132179	
Area Name		Phelps Dodge El Paso Operations				Account Number	EE-0067-L	
Report Period Start Date	5/18/2013	Report Period End Date	5/17/2014	Operating Permit Number	O1602	Report Submittal Date	06/13/2014	
Operating Permit Requirement for Which Deviations are Being Reported								
ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							

Dev Item No.	STEERS Incident No.	Deviation Period				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start Date	End Date	Time	Time			
Total Deviations: 0						Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	



FREEPORT-McMoRAN

Phelps Dodge Refining Corporation-El Paso Refinery and Rod Mill TX
897 Hawkins Blvd., El Paso, TX 79915 • (915) 782-7301 • FAX (915) 782-7789

CERTIFIED MAIL - ARTICLE NUMBER 7016 3560 0000 4010 8191
RETURN RECEIPT REQUESTED

December 15, 2017

US EPA, Region 6
Air Enforcement 6EN-A
1445 Ross Ave, Ste. 1200
Dallas, Texas 75202

Re: Phelps Dodge Refining Corporation, El Paso Refinery and Rod Mill
Account No. EE-0067-L
Title V Operating Permit No. O-1602
RN: RN100226000
CN: CN600132187
Semi-Annual Deviation Report – May 18, 2017, through November 17, 2017

To whom it may concern:

As required by the referenced Federal Operating Permit, Phelps Dodge El Paso Operations is enclosing the Annual Compliance Certification (PCC) for the respective period stated above, as well as a signed OP-CR01 form.

If you should have any questions or concerns, please do not hesitate to call me at (915) 782-7353.

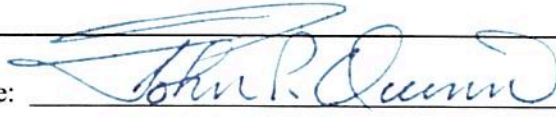
Sincerely,

Rajesh Bhakta
Sr. Environmental Engineer

Enclosures: Semi-Annual Deviation Report – May 2017 through November 2017
Form OP-CR01

Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. Identifying Information					
RN: 100226000		CN: 600132187		Account No.: EE-0067-L	
Permit No.: O-1602			Project No.: 1602		
Area Name: El Paso Refinery and Rod Mill			Company Name: Phelps Dodge Refining Corporation		
II. Certification Type <i>(Please mark the appropriate box)</i>					
<input checked="" type="checkbox"/> Responsible Official			<input type="checkbox"/> Duly Authorized Representative		
III. Submittal Type <i>(Please mark the appropriate box) (Only one response can be accepted per form)</i>					
<input type="checkbox"/> SOP/TOP Initial Permit Application		<input type="checkbox"/> Update to Permit Application			
<input type="checkbox"/> GOP Initial Permit Application		<input type="checkbox"/> Permit Revision, Renewal, or Reopening			
<input checked="" type="checkbox"/> Other: <u>Semi-Annual Deviation Report</u>					
IV. Certification of Truth					
This certification does not extend to information which is designated by the TCEQ as information for reference only.					
I, <u>John P. Quinn</u> certify that I am the <u>RO</u>					
<i>(Certifier Name printed or typed)</i>			<i>(RO or DAR)</i>		
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete:					
<i>Note: Enter Either a Time Period OR Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i>					
Time Period: From _____ to _____					
<i>Start Date</i> <i>End Date</i>					
Specific Dates: <u>12-15-2017</u>					
<i>Date 1</i> <i>Date 2</i> <i>Date 3</i> <i>Date 4</i> <i>Date 5</i> <i>Date 6</i>					
Signature:  Signature Date: <u>12-15-2017</u>					
Title: <u>General Manager</u>					



Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

AIR CO/RN100226000/RP

Permit Holder Name	Phelps Dodge Corporation					Customer Number	CN600132179
Area Name	Phelps Dodge El Paso Operations					Account Number	EE-0067-L
Report Period Start Date	05/18/2017	Report Period End Date	11/17/2017	Operating Permit Number	O1602	Report Submittal Date	12/15/2017
Operating Permit Requirement for Which Deviations are Being Reported							
ID Number	Term & Condition No.		Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method
Unit ID	Group ID						Monitoring Frequency

Dev Item No.	STEERS Incident No.	Deviation Period		No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start Date	End Time		N/A – No Deviations were reported during this period.	N/A – No Deviations were reported during this period.
Total Deviations:					Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?	<input type="checkbox"/> YES <input type="checkbox"/> NO



**Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 2)**

30 TAC Chapter 101 Non-Reportable Emission Events

Permit Holder Name		Phelps Dodge Corporation				Customer Number	CN600132179
Area Name		Phelps Dodge El Paso Operations				Account Number	EE-0067-L
Report Period Start Date	05/18/2017	Report Period End Date	11/17/2017	Operating Permit Number	O1602	Report Submittal Date	12/15/2017
Operating Permit Requirement for Which Deviations are Being Reported							
Unit ID	ID Number	Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method
	Group ID						

Dev Item No.	Deviation Period			No. of Dev	Cause of Deviation N/A – No Deviations were reported during this period.	Corrective Action Taken to Remedy or Mitigate Deviation Situation N/A – No Deviations were reported during this period.
	Start Date	End Date	Time			
Total Deviations:					Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?	

☐ YES ☐ NO



**Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 3)
OPTIONAL**

Miscellaneous Monitoring and Credible Evidence Submittal

Deviation Item Number	Monitoring Method/ Evidence Reference	Monitoring/Evidence Results supporting Compliance Status	Additional Materials attached? Y/N



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Al/A' /co

Phelps Dodge Refining Corporation
897 Hawkins Blvd., El Paso, TX 79915 • (915) 782-7301 • FAX (915) 782-7788

RECEIVE

CERTIFIED MAIL - ARTICLE NUMBER 7015 0640 0003 5826 8605
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JUN 20 2016

June 15, 2016

Air Toxics & Inspection
Coordination Branch
6EN-A

US EPA, Region 6
Air Enforcement 6EN-A
1445 Ross Ave, Ste. 1200
Dallas, Texas 75202

TX 10007397141
TX v. 3

Re: Phelps Dodge Refining Corporation, El Paso Refinery and Rod Mill
Account No. EE-0067-L
Title V Operating Permit No. O-1602
RN: RN100226000
CN: CN600132187
Annual Compliance Certification – May 18, 2015, through May 17, 2016

To whom it may concern:

As required by the referenced Federal Operating Permit, Phelps Dodge El Paso Operations is enclosing the Annual Compliance Certification (PCC) for the respective period stated above, as well as a signed OP-CR01 form.

If you should have any questions or concerns, please do not hesitate to call me at (915) 782-7353.

Sincerely,

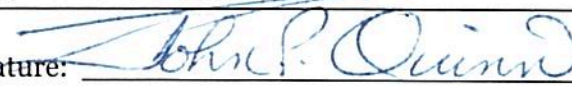
Rajesh Bhakta
Sr. Environmental Engineer

Enclosures: Annual Compliance Certification (PCC) – May 2015, through May 2016
Form OP-CR01



Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. IDENTIFYING INFORMATION		
RN: 100226000	CN: 600132187	Account No.: EE-0067-L
Permit No.: O-1602	Project No.: 1602	
Area Name: El Paso Refinery and Rod Mill	Company Name: Phelps Dodge Refining Corporation	
II. CERTIFICATION TYPE <i>(Please mark the appropriate box)</i>		
<input checked="" type="checkbox"/> Responsible Official	<input type="checkbox"/> Duly Authorized Representative	
III. SUBMITTAL TYPE <i>(Please mark the appropriate box) (Only one response can be accepted per form)</i>		
<input type="checkbox"/> SOP/TOP Initial Permit Application	<input type="checkbox"/> Update to Permit Application	
<input type="checkbox"/> GOP Initial Permit Application	<input type="checkbox"/> Permit Revision, Renewal, or Reopening	
<input checked="" type="checkbox"/> Other: <u>Semi Annual Deviation Report and Annual Compliance Certification</u>		
IV. CERTIFICATION OF TRUTH		
<p>This certification does not extend to information which is designated by the TCEQ as information for reference only.</p> <p>I, <u>John P. Quinn</u> certify that I am the <u>RO</u> <i>(Certifier Name printed or typed)</i> <i>(RO or DAR)</i></p> <p>and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete:</p> <p><i>Note: Enter EITHER a Time Period OR Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i></p> <p>Time Period: From _____ to _____ <i>State Date</i><i>End Date</i></p> <p>Specific Dates: <u>11/18/15-5/17/16 (Semi Annual Deviation Report)</u> <u>5/18/15-5/17/16 (Annual Compliance Certification)</u></p> <p>Signature: <u></u> Signature Date: <u>June 15, 2016</u></p> <p>Title: <u>General Manager</u></p>		



Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

AIR CO/RN100226000/RP

Permit Holder Name		Phelps Dodge Corporation				Customer Number	CN600132179	
Area Name		Phelps Dodge El Paso Operations				Account Number	EE-0067-L	
Report Period Start Date	05/18/2015	Report Period End Date	05/17/2016	Operating Permit Number	O1602	Report Submittal Date	06/15/2016	
Operating Permit Requirement for Which Deviations are Being Reported								
ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
Shaft Furnace Fabric Filter Baghouse (Furnace No. 2)	RM EP01A	FOP Special Condition 9	PM	NSR Permit #36726, Special Condition 9 as defined by Special Condition 14	Permit Standard	N/A	NSR Permit #36726, Special Condition 14	Permit requires daily monitoring but Permittee monitors continuously

Dev Item No.	STEERS Incident No.	Deviation Period				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start Date	Start Time	End Date	End Time			
1	N/A	7/08/2015	21:50	7/08/2015	21:58	1	At approximately 21:50, the differential pressure had spiked slightly above 7 inches for a few seconds during the 8 minute manual cleaning cycle. Upon further investigation, it was determined that the draft set point was fixed at 0.3. Having the draft set at 0.3, in conjunction with not having the cleaning cycle on Automatic caused the blower to work at a maximum of 60	Installed automatic controls to set furnace to low fire if the permit parameters approach limits. Also, installed alarm to ensure that the automatic cleaning cycle is engaged when operating. Note: This Deviation was previously submitted on the Semi-Annual deviation report dated December 15, 2015.

							Hz (100%), thus causing the differential pressure to rise until the cleaning cycle was manually initiated. During this 8 minutes, no emission limits were exceeded because the damper closes during a cleaning cycle, thus not allowing emissions to enter the RTO.	
2	N/A	2/15/ 2016	07:32	2/15/ 2016	07:39	1	At approximately 07:32, the differential dropped slightly below 0.5 inches for approximately 7 minutes. Upon further investigation, it was determined that a loose limit switch striker did not activate the baghouse module damper position, thus causing the main blower to ramp down speed and affecting the differential pressure.	The limit switch was immediately inspected and securely fastened to ensure the functionality of the module damper position. Note: This Deviation is being submitted for this Semi-Annual deviation period of November 2015 to May 2016.
Total Deviations:						2	Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO



**Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 3)
OPTIONAL**

Miscellaneous Monitoring and Credible Evidence Submittal

Deviation Item Number	Monitoring Method/ Evidence Reference	Monitoring/Evidence Results supporting Compliance Status	Additional Materials attached? Y/N
1	Furnace/RTO operational parameters	Pressure gauges are installed, calibrated and maintained to monitor and record the differential pressure. The differential pressure is recorded on a daily basis to maintain compliance.	N
2	Furnace/RTO operational parameters	Pressure gauges are installed, calibrated and maintained to monitor and record the differential pressure. The differential pressure is recorded on a daily basis to maintain compliance.	N



**Texas Commission on Environmental Quality
Federal Operating Permit Form
Permit Compliance Certification – PCC (Part 1)**

Permit Holder Name	Phelps Dodge Refining Corporation	Customer Number	CN600132179
Area Name	El Paso Refinery and Rod Mill	Account Number	EE-0067-L
Operating Permit Number	O - 1602	Report Submittal Date	6/15/2016
Certification Period Start Date	5/18/2015	End Date	5/17/2016

I. Certification of Continuous Compliance with Permit Terms and Conditions (Indicate response by placing a 'x' in the appropriate column for each of the following questions)	Response:	
	Yes	No
With the possible exception of those permit terms and conditions identified in the 'Summary of Deviations' found using, at a minimum, but not limited to, the continuous or intermittent compliance method data from monitoring, recordkeeping, reporting, or testing required by the permit and any other credible evidence or information, was the permit holder in continuous compliance with all the terms and conditions of the permit over the Certification Period?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

II. Summary of Deviations (Indicate response by placing a 'x' in the appropriate column for each of the following questions)	Response:	
	Yes	No
<p>A. Were there any deviations from any permit requirements during the Certification Period that have <i>previously</i> been reported to the agency?</p> <p>If the answer to this question is 'Yes', please complete and attach Part 2 to this submittal.</p> <p><i>Important Note:</i> If previously submitted reports did not contain specific information on monitoring methods, frequency and the total number of deviations experienced over the entire certification period, then use form DevRep to provide that information.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>B. Were there any deviations from any terms or conditions of the permit during the Certification Period that are <i>currently</i> being submitted to the agency?</p> <p>If the answer to this question is 'Yes', please include the relevant reports along with this page.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Permit Holder Name	Phelps Dodge Refining Corporation	Customer Number	CN600132179
Area Name	El Paso Refinery and Rod Mill	Account Number	EE-0067-L
Operating Permit Number	O - 1602	Report Submittal Date	6/15/2016
Certification Period Start Date	5/18/2015	End Date	5/17/2016

[illegible]



Texas Commission on Environmental Quality
Federal Operating Permit Form
PCC – Monitoring Options Selected (Part 3)

Permit Holder Name	PHELPS DODGE REFINING CORPORATION			Customer Number	CN600132179
Area Name	El Paso Refinery and Rod Mill			Account Number	EE-0067-L
Operating Permit Number	O-1602			Report Submittal Date	6/15/2016
Certification Period Start Date	5/18/2015			End Date	5/17/2016

ID Number		Regulatory Requirement (Rule or Permit No. and Prov.)	Pollutant Monitored	SOP or GOP Index Number	Monitoring Option Used	Dates		Description/Comments
						Begin	End	
Unit ID	Group ID	NSR Permit #36726, Special Condition 9 as defined by Special Condition 14	PM	N/A	NSR Permit #36726, Special Condition 14	7/8/2015	7/8/2015	<p>The draft set point was fixed at 0.3. Having the draft set at 0.3, in conjunction with not having the cleaning cycle on Automatic caused the blower to work at a maximum of 60 Hz (100%), thus causing the differential pressure to rise until the cleaning cycle was manually initiated. During this 8 minutes, no emission limits were exceeded because the damper closes during a cleaning cycle, thus not allowing emissions to enter the RTO.</p> <p>Installed automatic controls to set furnace to low fire if the permit parameters approach limits. Also, installed alarm to ensure that the automatic cleaning cycle is engaged when operating.</p>
Shaft Furnace Fabric Filter Baghouse (Furnace No. 2)	RM EP01A							

Shaft Furnace Fabric Filter Baghouse e (Furnace No. 2)	RM EP01A	NSR Permit #36726, Special Condition 9 as defined by Special Condition 14	PM	N/A	NSR Permit #36726, Special Condition 14	7/8/2015	7/8/2015	A loose limit switch striker did not activate the baghouse module damper position, thus causing the main blower to ramp down speed and affecting the differential pressure. The limit switch was immediately inspected and securely fastened to ensure the functionality of the module damper position.



Phelps Dodge Refining Corporation-El Paso Refinery and Rod Mill
897 Hawkins Blvd., El Paso, TX 79915 • (915) 782-7301 • FAX (915) 782-7789

110000466273

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US EPA, DALLAS, TX
DIRECTOR

16 DEC 19 PM 11:06

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RETURN RECEIPT REQUESTED

COMPLIANCE ASSURANCE
& ENFORCEMENT DIV.

December 14, 2016

AI / AI / CO

US EPA, Region 6
Air Enforcement 6EN-A
1445 Ross Ave, Ste. 1200
Dallas, Texas 75202

Re: Phelps Dodge Refining Corporation, El Paso Refinery and Rod Mill
Account No. EE-0067-L
Title V Operating Permit No. O-1602
RN: RN100226000
CN: CN600132179
Semi-Annual Deviation Report – May 18, 2016, through November 17, 2016

To whom it may concern:

As required by the referenced Federal Operating Permit, Phelps Dodge El Paso Operations is enclosing the Semi-Annual Deviation Report for the respective period stated above, as well as a signed OP-CR01 form.

If you should have any questions or concerns, please do not hesitate to call me at (915) 782-7353.

Sincerely,

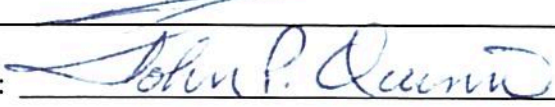
Rajesh Bhakta
Sr. Environmental Engineer

Enclosures: Semi-Annual Deviation Report – May 2016, through November 2016
Form OP-CR01



Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. IDENTIFYING INFORMATION					
RN: 100226000		CN: 600132179		Account No.: EE-0067-L	
Permit No.: O1602			Project No.: 1602		
Area Name: Phelps Dodge El Paso Operations			Company Name: Phelps Dodge Corporation		
II. CERTIFICATION TYPE <i>(Please mark the appropriate box)</i>					
<input checked="" type="checkbox"/> Responsible Official			<input type="checkbox"/> Duly Authorized Representative		
III. SUBMITTAL TYPE <i>(Please mark the appropriate box) (Only one response can be accepted per form)</i>					
<input type="checkbox"/> SOP/TOP Initial Permit Application		<input type="checkbox"/> Update to Permit Application			
<input type="checkbox"/> GOP Initial Permit Application		<input type="checkbox"/> Permit Revision, Renewal, or Reopening			
<input checked="" type="checkbox"/> Other: <u>Semi Annual Deviation Report</u>					
IV. CERTIFICATION OF TRUTH					
This certification does not extend to information which is designated by the TCEQ as information for reference only.					
I, <u>John P. Quinn</u> certify that I am the <u>RO</u> <i>(Certifier Name printed or typed)</i> <i>(RO or DAR)</i>					
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete:					
<i>Note: Enter EITHER a Time Period OR Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i>					
Time Period: From _____ to _____ <div style="text-align: center;"><i>Start Date</i> <i>End Date</i></div>					
Specific Dates: <u>5/18/16- 11/17/16 (Semi Annual Deviation Report)</u>					
<i>Date 1</i>		<i>Date 2</i>		<i>Date 3</i>	<i>Date 4</i>
<i>Date 5</i>		<i>Date 6</i>			
Signature: <u></u> Signature Date: <u>12/14/16</u>					
Title: <u>General Manager</u>					



Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

AIR CO/RN100226000/RP

Permit Holder Name		Phelps Dodge Corporation				Customer Number	CN600132179	
Area Name		Phelps Dodge El Paso Operations				Account Number	EE-0067-L	
Report Period Start Date	05/18/2016	Report Period End Date	11/17/2016	Operating Permit Number	O1602	Report Submittal Date	12/14/2016	
Operating Permit Requirement for Which Deviations are Being Reported								
ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
Solar Taurus Gas Turbine (GT No. 4)	GRPTURB	FOP Special Condition 9	N/A	NSR Permit #20535, Special Condition 8 as defined by Special Condition 14	Permit Standard	N/A	NSR Permit #20535, Special Condition 14	Permit requires average hourly monitoring

Dev Item No.	STEERS Incident No.	Deviation Period				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
1	N/A	3/07/2016	18:00	3/07/2016	19:00	1	The Predictive Emission Monitoring System (PEMS) Data Solar #4 for March 7, 2016, at 1800 hours were inadvertently not entered on the log sheet. The lack of entry onto the form was due to human error and occurred during a personnel shift change. El Paso Operations would've reacted accordingly if there was a NOx exceedance. Alarms are in place if NOx levels elevate	The PEMS daily logs will be reviewed for completeness more frequently by Supervisor and Environmental Department. El Paso Operations has discussed the situation with the responsible employees and reiterated the importance of these records. The PEMS electronic logging will be extended for greater than 30 days and such data will be archived electronically for backup purposes.

										above permit limits. During this hour no NOx exceedance alarms were noted in the operator's logbook.	
Total Deviations: 1										Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO



**Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 3)
OPTIONAL**

Miscellaneous Monitoring and Credible Evidence Submittal

Deviation Item Number	Monitoring Method/ Evidence Reference	Monitoring/Evidence Results supporting Compliance Status	Additional Materials attached? Y/N
1	Solar Taurus Turbine operational parameters	The average hourly turbine inlet temperature, atmospheric pressure, relative humidity, power turbine inlet temperature (T5), and average hourly water injection rate are recorded on an hourly basis to maintain compliance.	N